April 8, 2002

In the matter of Schools and Libraries Universal Services Support Mechanism
CC Docket 02-6
Notice of Proposed Rulemaking and Order

The Community Technology Centers' Network (CTCNet) is a national network of over 675 independent organizations that offer training and access to computers and related technologies like the Internet. Our affiliates are located in both rural and urban low-income communities in 44 states. They include multi-service agencies, community networks, adult literacy programs, job training and entrepreneurship programs, public housing facilities, public schools and libraries, and after-school programs.

In response to Section II(B)(3), Use of Excess Services in Remote Areas:
CTCNet applauds the Commission's recent decision to grant the state of Alaska a limited rules waiver – the Alaska Order will greatly benefit communities in that state while better utilizing excess capacity. **We recommend that the Commission allow other schools and libraries across the country to make excess capacity available to their communities as well.**

The citizens of Alaska are not alone. While policy leaders at the national level debate the issues of broadband access, the reality remains that numerous communities across the country lack local or toll-free dial-up Internet access. Many less densely populated rural areas have no access to low-cost commercial Internet providers.

Using a database that listed the POPs used by different ISPs, two researchers found in 1998 that 5% of the US population could obtain only costly Internet access (toll calls). They noted 247 counties that lacked an ISP and another 141 counties that had only one ISP.[i] For the most part, rural communities with low-cost dial-up access were served by local ISPs, as opposed to national providers.

The database is no longer available, according to Dr. Sharon Strover,[ii] and CTCNet has been unable to locate more recent data (the lack of which may indicate some degree of inattention to rural access issues). In light of the collapse of many small ISPs during the last several years, however, it is reasonable to surmise that many communities still lack low-cost dial-up access. Anecdotal evidence from our members supports this conclusion and indicates that some low-income urban areas may also lack such access.

1. **Extend the Alaska Order**
   We urge, at a minimum, that the Commission revise its rules and explicitly extend the terms of the Alaska Order to all communities that lack local or toll-free Internet dial-up access. Many of these communities are likely to include schools and libraries that qualify for discounts under the E-rate program.

2. **Expand the Alaska Order**
   Our further recommendation is that the FCC permit schools and libraries to fully exercise their own discretion in choosing whether to make excess bandwidth capacity available to their communities as long as they can certify that these decisions do not increase costs to the program nor impair the use of discounted services toward their principal educational purpose. We urge that the FCC grant this discretion to **all** schools and libraries that qualify for discounted services, regardless of a community's access to toll-free dial-up access.

If schools and libraries are given the opportunity to exercise discretion, we expect to see a variety of creative responses:

- In remote communities without toll-free Internet access, a school may allow students and their families to obtain it through the school in the evening. As a result, demand for home Internet access in the community may steadily expand to the point that it becomes more viable for a commercial ISP to provide service.
- Schools may permit nearby nonprofit organizations that run educational after-school programs to tap into unutilized bandwidth during late afternoon and evening hours.
- Increasingly, libraries may choose to allow wireless access points on their roofs, enabling people to explore the World Wide Web while seated on benches outside even when a library is closed.

Low-cost Internet services are often out of reach for citizens who lack the money, training, or skills to take advantage of them. According to Strover, "even as E-rate provisions bring Internet connectivity into the universal service fold for certain institutions [schools and libraries], more general Internet access to a broader community constituency seems to have consequences for regional economic development."[iii]

The collective wisdom and experience of our member organizations indicates the accuracy of Dr. Strover's statement. CTCNet believes this is an opportunity to deepen and multiply existing partnerships among Community Technology Centers (CTCs), schools and libraries. Many CTCs already run after-school programs that complement in-school curricula. Some provide schools with hardware in exchange for evening use of facilities to teach adult education classes. Many libraries house and administer CTC programs. Countless collaborations like these can be furthered if the Commission allows schools and libraries to make excess services available to their communities.

We commend the Commission for exploring this opportunity to extend the Universal Services Support Mechanism's impact much further into low-income and remote communities without increasing the program's costs or diminishing its primary purpose.

Respectfully Submitted on Behalf of CTCNet's Membership,
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[i] Thomas Downes and Shane Greenstein, *Do Commercial ISPs Provide Universal Access.* December 1998. http://www.kellogg.nwu.edu/faculty/greenstein/images/research.html

[ii] Sharon Strover, *Rural Internet Connectivity.* September 1999. http://www.utexas.edu/research/tipi/Reports/Reports.htm

[iii] See above.